

MINOR SOURCE OPERATING PERMIT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY and CITY OF INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**Taylor Tire Treading Co.
2101 East Massachusetts Avenue
Indianapolis, Indiana 46218**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1 if new source, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-18261-00516	
Issued by: ORIGINALLY SIGNED BY John B. Chavez, Administrator City of Indianapolis Office of Environmental Services	Issuance Date: January 30, 2004 Expiration Date: January 30, 2009

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and the Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary tire retreader.

Authorized Individual: Carl Taylor
Source Address: 2101 East Massachusetts Avenue, Indianapolis, Indiana 46218
Mailing Address: 2101 East Massachusetts Avenue, Indianapolis, Indiana 46218
General Source Phone: (317) 634-9476
SIC Code: 7534
County Location: Marion
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Two (2) tire buffers, identified as units 001 and 002, installed in 1983, with a combined maximum capacity of five (5) tires per hour, using a cyclone as control, and exhausting to stack S001.
- (b) Seventeen (17) curing stations, identified as units 003 through 019, with a combined maximum capacity of five (5) tires per hour, using no control, and exhausting to the atmosphere. Units 003 through 016 were installed in 1983, and units 017 through 019 were installed in 2003.
- (c) One (1) spray coating station, identified as 020, installed in 1983, with a maximum capacity of five (5) tires per hour, using no control, and exhausting to the atmosphere.
- (d) Gluing operations, identified as 021, installed in 1983, using a maximum of 0.36 gallons per day of glues/cements.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [40 CFR 124]

Pursuant to 40 CFR 124.15, 40 CFR 124.19, and 40 CFR 124.20, this permit will become effective immediately upon its issuance if no comments requested a change in the draft permit. If a comment is received which requests a change, the effective date of this permit will be thirty (30) days after the service of notice of the decision. If the final day of the thirty (30) day time period falls on a weekend or legal holiday, the time period shall be extended to the next working day.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to IDEM, OAQ, and OES stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by an Authorized individual as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an Authorized individual as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by an authorized individual as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]
[IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, or OES, or U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the Authorized individual as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [Indianapolis Code of Ordinances Section, 511-521]

- (a) The Permittee shall pay annual fees to City of Indianapolis, OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call Joyce Jackson at (317) 327-2234 for more information.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, and OES, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Enforcement
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an authorized individual as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ, and OES.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14 days) prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.6 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.7 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.9 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and OES or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, and OES using the

Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.10 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.11 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an authorized individual as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description : Two (2) tire buffers, identified as units 001 and 002, installed in 1983, with a combined maximum capacity of five (5) tires per hour, using a cyclone as control, and exhausting to stack S001.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Emission Limitations, Work Practices and Control Technologies [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the tire buffing operations, identified as 001 and 002, shall be controlled by the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{Rate of emission in pounds per hour;} \\ P = \text{Process weight rate in tons per hour.}$$

The maximum process weight rate for tire buffing operations is 0.3125 tons per hour. Therefore, the rate of emissions from tire buffing operations shall not exceed 1.88 pounds per hour of particulate matter.

Compliance Determination Requirements

D.1.2 Particulate Control

In order to comply with D.1.1, at all times tire buffers are in operation, the cyclone shall be in operation and controlling emissions from the tire buffers.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description : One (1) spray coating station, identified as 020, installed in 1983, with a maximum capacity of five (5) tires per hour, using no control, and exhausting to the atmosphere.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-1]

In order that 326 IAC 6-3-1 does not apply, the spray coating station, identified as 020, shall use less than five (5) gallons of coating per day.

Record Keeping and Reporting Requirement

D.2.2 Record Keeping Requirements

To document compliance with Condition D.2.1 the Permittee shall maintain records of the volume of coating used per day.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**MSOP Usage Report
(Submit Report Quarterly)**

Source Name: Taylor Tire Treading Co.
Source Address: 2101 East Massachusetts Avenue, Indianapolis, Indiana 46218
Mailing Address: 2101 East Massachusetts Avenue, Indianapolis, Indiana 46218
FESOP No.: F097-18261-00516
Facility: Spray Coating Operation, 020
Parameter: Gallons of Coating Used Daily
Limit: five (5) gallons per day

Month: _____ Year: _____

Day	Day
1	17
2	18
3	19
4	20
5	21
6	22
7	23
8	24
9	25
10	26
11	27
12	28
13	29
14	30
15	31
16	

? No deviation occurred in this month.

? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Taylor Tire Treading Co.
Address:	2101 East Massachusetts Avenue
City:	Indianapolis, Indiana 46218
Phone #:	(317) 634-9476
MSOP #:	097-18261-00516

I hereby certify that Taylor Tire Treading Co. is still in operation.
 no longer in operation.

I hereby certify that Taylor Tire Treading Co. is in compliance with the requirements of MSOP 097-18261-00516.
 not in compliance with the requirements of MSOP 097-18261-00516.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967
OES FAX NUMBER - 317 327 2274**

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION< AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

BY: _____ DATE: _____ MALFUNCTION RECORDED TIME: _____

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 Malfunction@ definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Taylor Tire Treading Co.
Source Location: 2101 East Massachusetts Avenue, Indianapolis, Indiana 46218
County: Marion
SIC Code: 7534
Operation Permit No.: 097-18261-00516
Permit Reviewer: Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from Taylor Tire Treading Co. relating to the construction and operation of a tire retreader.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units and pollution control devices:

- (a) Two (2) tire buffers, identified as units 001 and 002, installed in 1983, with a combined maximum capacity of five (5) tires per hour, using a cyclone as control, and exhausting to stack S001.
- (b) Seventeen (17) curing stations, identified as units 003 through 019, with a combined maximum capacity of five (5) tires per hour, using no control, and exhausting to the atmosphere. Units 003 through 016 were installed in 1983, and units 017 through 019 were installed in 2003.
- (c) One (1) spray coating station, identified as 020, installed in 1983, with a maximum capacity of five (5) tires per hour, using no control, and exhausting to the atmosphere.
- (d) Gluing operations, identified as 021, installed in 1983, using a maximum of 0.36 gallons per day of glues/cements.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S001	tire buffers	10	1	30,000	ambient

Enforcement Issue

- (a) OES is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) OES is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on October 17, 2003.

Emission Calculations

See Appendix A (four pages) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.®

Pollutant	Potential To Emit (tons/year)
PM	42.57
PM-10	42.57
SO ₂	negligible
VOC	3.40
CO	negligible
NO _x	negligible
HAPs	negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (d) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	42.57
PM10	42.57
SO ₂	negligible
VOC	3.40
CO	negligible
NO _x	negligible
Single HAP	negligible
Combination	negligible

- (a) This source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) These emissions are based on the information provided in the source's operating permit application.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 1983. This source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(w)(1) and the potential to emit of all regulated pollutants before controls from this source is less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit less than ten (10) tons per year of NO_x and/or VOC in Marion County and less than one hundred (100) tons per year of Particulate Matter (PM). In addition, the potential to emit HAPs is less than any major source threshold and, as such, is not required to obtain a permit under 326 IAC 2-7 (Part 70 Permit Program). As a result, 326 IAC 2-6 (Emission Reporting) does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Tire Buffing

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the tire buffing operations, identified as 001 and 002, shall be controlled by the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{Rate of emission in pounds per hour;} \\ P = \text{Process weight rate in tons per hour.}$$

The maximum process weight rate for tire buffing operations is 0.3125 tons per hour. Therefore, the rate of emissions from tire buffing operations shall not exceed 1.88 pounds per hour of particulate matter. The tire buffing operations are in compliance with 326 IAC 6-3-2 through the use of a cyclone, giving a rate of emissions of 1.79 pounds per hour as shown in Appendix A on page three of four.

State Rule Applicability - Curing Chambers

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The curing chambers are not subject to the requirements of 326 IAC 8-1-6 because they do not have potential emissions of twenty-five (25) tons or more per year of VOC.

State Rule Applicability - Spray Coating Station

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 6-3-1(b)(15), the spray coating station, identified as 020, is not subject to the requirements of 326 IAC 6-3-1 because the operation has the potential to use less than five (5) gallons of coating per day. The operation shall not exceed five (5) gallons of coating per day in order that this rule does not apply.

Conclusion

The operation of this tire retreader shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-18261-00516.

**Appendix A: Emissions Calculations
VOC Emissions
Tire Grinding and Curing**

**Company Name: Talyor Tire Treading Co.
Address City IN Zip: 2101 East Massachusetts Avenue, Indianapolis, Indiana 46218
Permit #: 097-18261-00516
Reviewer: Angelique Oliger
Date: October 24, 2003**

Tire Grinding

Tires Ground per day	pounds rubber buffed per tire	VOC emissions factor1 (lb / lb)	VOC emissions (tons/ year)
120	15	5.21E-04	0.17

VOC emissions (tons / yr) = tires ground / day * lbs rubber buffed / tire ground
* lb VOC / lb rubber buffed * 1 ton / 2000 lbs * 365 days / yr

Curing Process

Tire Cured per day	tire weight (lbs)	VOC emissions factor1 (lb / lb)	rubber content per tire (lb / lb)	Reduction for pre-curing	VOC emissions (tons/ year)
120	125	1.18E-03	1.00	0%	3.23

VOC emissions (tons / yr) = tires cured / day * lbs / tire cured * lbs VOC / lb rubber
* lb rubber / lb tire * (1-% reduction) * 365 day / yr * 1 ton / 2000 lbs

(1) - Emissions factors developed by the Rubber Manufacturers Association and published in Chapter 4.12 of AP-42.

Gluing Operations

Maximum Glue used per day (gallons)	VOC content (lb / gal)	VOC emissions (tons/ year)
0.36	0.00E+00	0.00

VOC emissions (tons / yr) = gallons glue / day * lbs VOC / gallon glue * 1 ton / 2000 lbs * 8760 days / year

**Appendix A: Emissions Calculations
HAPs Emissions
Tire Grinding and Curing**

Company Name: Talyor Tire Treading Co.
Address: 2101 East Massachusetts Avenue, Indianapolis, Indiana 46218
Permit #: 097-18261-00516
Reviewer: Angelique Oliger
Date: October 24, 2003

Tire Grinding

Tires Ground per day	pounds rubber buffed per tire	HAP emissions factor (lb / lb)	HAP emissions (tons/ year)
120	15	0.00E+00	0.00

HAP emissions (tons / yr) = tires ground / day * lbs rubber buffed / tire ground
 * lb HAP / lb rubber buffed * 1 ton / 2000 lbs * 365 days / yr

Curing Process

Tire Cured per day	tire weight (lbs)	HAP emissions factor (lb / lb)	rubber content per tire (lb / lb)	Reduction for pre-curing	HAP emissions (tons/ year)
120	125	0.00E+00	1.00	0%	0.00

HAP emissions (tons / yr) = tires cured / day * lbs / tire cured * lbs HAP / lb rubber
 * lb rubber / lb tire * % reduction * 365 day / yr * 1 ton / 2000 lbs

Total HAP emissions 0.00

**Appendix A: Emissions Calculations
PM Emissions
Grinding, and Coating**

**Company Name: Talyor Tire Treading Co.
Address City IN Zip: 2101 East Massachusetts Avenue, Indianapolis, Indiana 46218
Permit #: 097-18261-00516
Reviewer: Angelique Oligier
Date: October 24, 2003**

Tire Grinding

	Tires Ground per day	pounds rubber removed per tire	PM emissions factor1 (lb PM / lb buffed)	PM emissions before shaving (tons/year)	Reduction for shaving	PM emissions after shaving (tons/ year)	Cyclone Control Efficiency	Controlled PM emissions after shaving (tons/yr)
Potential	120	15	0.50	164.25	75%	41.06		
Controlled	120	15	0.50	164.25	75%	41.06	99%	0.41

PM emissions (tons / yr) = tires ground / day * lbs rubber buffed / tire ground * lb PM / lb rubber buffed

* (1-% reduction for shaving) * 1 ton / 2000 lbs * 365 days / yr

Controlled PM emissions (tons / yr) = tires ground / day * lbs rubber buffed / tire ground * lb PM / lb rubber buffed

* (1-% reduction for shaving) * 1 ton / 2000 lbs * 365 days / yr * (1-.99)

(1) - Emissions factors developed by the Rubber Manufacturers Association and published in Chapter 4.12 of AP-42.

Powder Coating

gallons coating used per day	Density of coating (lbs/gallon)	PM emissions factor (lb / lb)	transfer efficiency of spray gun	PM emissions (tons/ year)
1	10	0.72	30%	1.51

PM emissions (tons / yr) = tires coated / day * lbs coating / tire * lbs PM / lbs coating

* (1-%transfer efficiency) * (1-control efficiency) * 365 days / yr * 1 ton / 2000 lbs

**Appendix A: Emissions Calculations
Summary**

Company Name: Talyor Tire Treading Co.

Address: 2101 East Massachusetts Avenue, Indianapolis, Indiana 46218

Permit #: 097-18261-00516

Reviewer: Angelique Oligier

Date: October 24, 2003

Sourcewide Potential Emissions (tons / yr)

Emissions Unit	PM	PM10	SO2	NOx	VOC	CO	HAP
Tire Grinding	41.06	41.06	0.00	0.00	0.17	0.00	0.00
Powder Coating	1.51	1.51	0.00	0.00	0.00	0.00	0.00
Gluing Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Curing	0.00	0.00	0.00	0.00	3.23	0.00	0.00
Total	42.57	42.57	0.00	0.00	3.40	0.00	0.00